

**REMARKS/ARGUMENTS:**

1. The applicant thanks the examiner for the comments in the detailed action which have greatly assisted the applicant in responding.

**ALLOWABLE SUBJECT MATTER**

2. The examiner stated in the 06/02/2010 office action that “**Since the scope of the claims have changed, the claims are again considered without regard to the previous indication of allowability because the previous indication was dependent of claims CONSISTING of these steps.**”(Page 2, Middle). The applicant respectfully disagrees. The examiner stated in the 02/04/2010 office action that “**The prior art of record does not teach the combination of only those method steps in the claims, which excludes the other steps necessary to perform those steps listed in the claims**” (Page 8, paragraph 8). The 04/02/2010 amendment (submitted in the 04/30/2010 RCE Submission) includes 5 independent claims, each of which is in the close-end format of “**CONSISTING OF**”. In particular, claims 8, 15 and 32 in the 04/30/2010 submission were only reformatted in response to the “Allowable Subject Matter” indication in the 02/04/2010 office action, and their scopes were not changed. In the present amendment, the applicant has made the claims in allowable form and condition. Each of the amended claims particularly point out and distinctly claim the subject matter which the applicant regards as the invention. In each of them, there is no “wherein” clauses. Further, each of

the method claims includes the essential steps. Therefore, the applicant requests that the examiner reconsider the allowable subject matter indication and allow the claims.

FORMALITY CORRECTION

3. Appropriate correction has been made with regard to the informalities pointed out by the examiner.

CLAIM REJECTIONS – 35 USC § 103

4. The examiner cited “Experience from Translation of EU Documents” by Proszeky (hereinafter as Proszeky), stating that Proszeky teaches/suggests the claimed invention and that Proszeky, in view of Kutsumi (US 5,826,219) and Mandt (US 6, 621,532), renders claims 8, 15, 59 and 60 unpatentable. The applicant respectfully disagrees.

4.1. Proszeky, **Section 4, especially the 2<sup>nd</sup> paragraph above the Section 4.1. Header**, based on which the examiner made his rejections, reads: “Another special client – called *MoBiMouse* – of the client/server version is one that enables the user to see the translation of displayed text without a single mouse click. The user only has to move the mouse pointer over the appropriate word, then the program reads this text from the screen with a special character recognition technology, and displays its translation in another language. It is the fastest way in which translators can use dictionaries on a computer.”

4.2. Proszeky introduces a mouse-over aid incorporated in an electronic dictionary. The cited reference does not disclose any technical information which sufficiently enables an ordinary person in the art to carry out the invention claimed in the

present application. In particular, Proszeky does not disclose or teach the following features:

4.2.(a) screen-scraping a segment of text adjacent to, or overlaid by, the user's mouse pointer (Proszeky suggests that "the user only has to move the mouse pointer over the appropriate word", but it does not suggests/teaches isolating a segment of text for performing the recognition of the text);

4.2.(b) calibrating the screen-scraped segment of text into a query according to one or more rules, the length of the segment of text being automatically adjusted according to one or more logic, linguistic and/or grammatical rules (Proszeky suggests that the system "looks up all words and expressions" of "the appropriate word", but it does not suggests/teaches treating a segment of text into a query which may be more than a word, such as a phrase, a sentence, or even a paragraph -- See paragraph [0050] of the present application);

4.2.(c) translating the query into a second language by looking up a database and applying a set of logic, linguistic and grammatical rules (Proszeky suggests that the translation of "the appropriate word", but it does not suggests/teaches translating the calibrated query, which may be more than a word, such as a phrase, a sentence, or even a paragraph); and

4.2.(d) displaying on the user's screen an annotation callout dynamically associated with the user's mouse pointer, the annotation callout containing the query and the query's translation, having a tail which approximately overlaps with the user's mouse pointer, and being adaptive to fit a content therein (Proszeky suggests that the system displays the translation of "the appropriate word" in another language, but it does not suggests/teaches anything about the dynamic callout).

4.3. Although Kutsumi (col. 21, Lines 45-54) suggests the bilingual annotation, it does not render the features of 4.2.(a) and 4.2.(b) obvious because Proszeky does not disclose and thus does not anticipate the features of 4.2.(a) and 4.2.(b).

4.4. Although Kutsumi (col. 6, Lines 27-41) suggests storage unit storing dictionary data, grammar rule data and other translation rule data to be used for dividing sentences into phrases, it does not render the features of 4.2.(a) and 4.2.(b) obvious because Proszeky does not disclose and thus does not anticipate the features of 4.2.(a) and 4.2.(b).

4.5. Although Mandt (Col. 8, Lines 34-36; and FIG. 4) suggests a bubble help close to the mouse pointer, it does not render the features of 4.2.(a) and 4.2.(b) obvious because Proszeky does not disclose and thus does not anticipate the features of 4.2.(a) and 4.2.(b).

5. With regard to the examiner's rejection to claim 32, although Scanlan (US, 6,857,022) suggests a network-based system in which the server delivers a translation to the remote user's browser, it does not render the features of 4.2.(a) and 4.2.(b) obvious because Proszeky does not disclose and thus does not anticipate the features of 4.2.(a) and 4.2.(b).

6. Under the totality of circumstances, because Proszeky does not disclose and thus does not anticipate the specific features of 4.2.(a) and 4.2.(b), the cited references would not enable one of ordinary skill in the art at the time of the present invention to

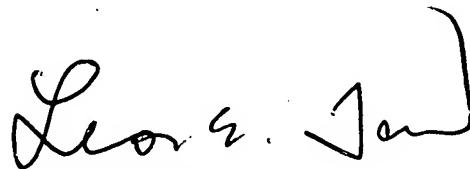
make the invention which is claimed in the close-end format ("CONSISTING OF"), and therefore would not render the claimed invention obvious.

**CONCLUSION**

Based on the foregoing, the applicant considers the present invention to be distinguished from the art of record. Accordingly, the applicant earnestly solicits the examiner's withdrawal of the rejections raised in the above referenced Office Action, such that a Notice of Allowance is forwarded to the applicant, and the present invention is therefore allowed to issue as a United States patent.

Respectfully Submitted,

Dated: 31 August 2010



Leon E. Jew  
Reg. 46, 804